LOWER PASSAIC RIVER STUDY AREA
PRP DATA EXTRACTION FORM

ARDMORE, INC.

CURRENT MAILING ADDRESS/CONTACT INFO:

Albert Sharphouse, Jr., President
Ardmore, Inc.
29 Riverside Avenue, Bldg. 14
Newark, NJ 07104
(FAU000336 at Tab 1, FAU000359 at Tab 6)

FACILITY ADDRESS:

Ardmore, Inc.
29 Riverside Avenue, Bldg. 14
Newark, NJ 07104
(the "Site")
(FAU000336 at Tab 1, FAU000217 at Tab 2)

Ardmore Chemical Co.
Riverside Industrial Park
29 Riverside Avenue
Newark, NJ 07104
(FAU00364 at Tab 3)

FINANCIAL VIABILITY (annual revenue, # of employees):

Ardmore Chemical Company, Inc., ("Ardmore") was incorporated in the State of New Jersey on September 15, 1958. The company was started in 1958 by Albert Sharphouse, Sr., and is reported to have remained in the full control of the Sharphouse family since its inception. According to a Certificate of Amendment filed with the New Jersey Secretary of State, the company changed its name to Ardmore, Inc. effective July 1, 1988. (FAU000338 at Tab1, FAU000343 at Tab 4, FAU000474 at Tab 53, FAU483 at Tab 54)

The company was listed as Ardmore Chemical Company, Inc., 29 Riverside Avenue, Newark, NJ in the 1987, 1992, and 1996 New Jersey Industrial Directories. The company was listed on various PVSC regulatory filings from and after 1997, A 2001 New Jersey Industrial Directory lists the company Ardmore, Inc. (FAU000044 at Tab 5, FAU000343 at Tab 4, FAU000351 at Tab 6, FAU000353 at Tab 6, FAU000355 at Tab 6, FAU000357 at Tab 6, FAU000359 at Tab 6)

Albert Sharphouse, Jr., presently serves as the President of Ardmore. Based on information provided by the company in 2005, Ardmore had estimated sales of $1.2 Million. A New Jersey Industrial Directory for 2004 confirms that Ardmore has sales ranging from $1 Million to $5 Million. (FAU000336-337 at Tab 1, FAU000359 at Tab 6)

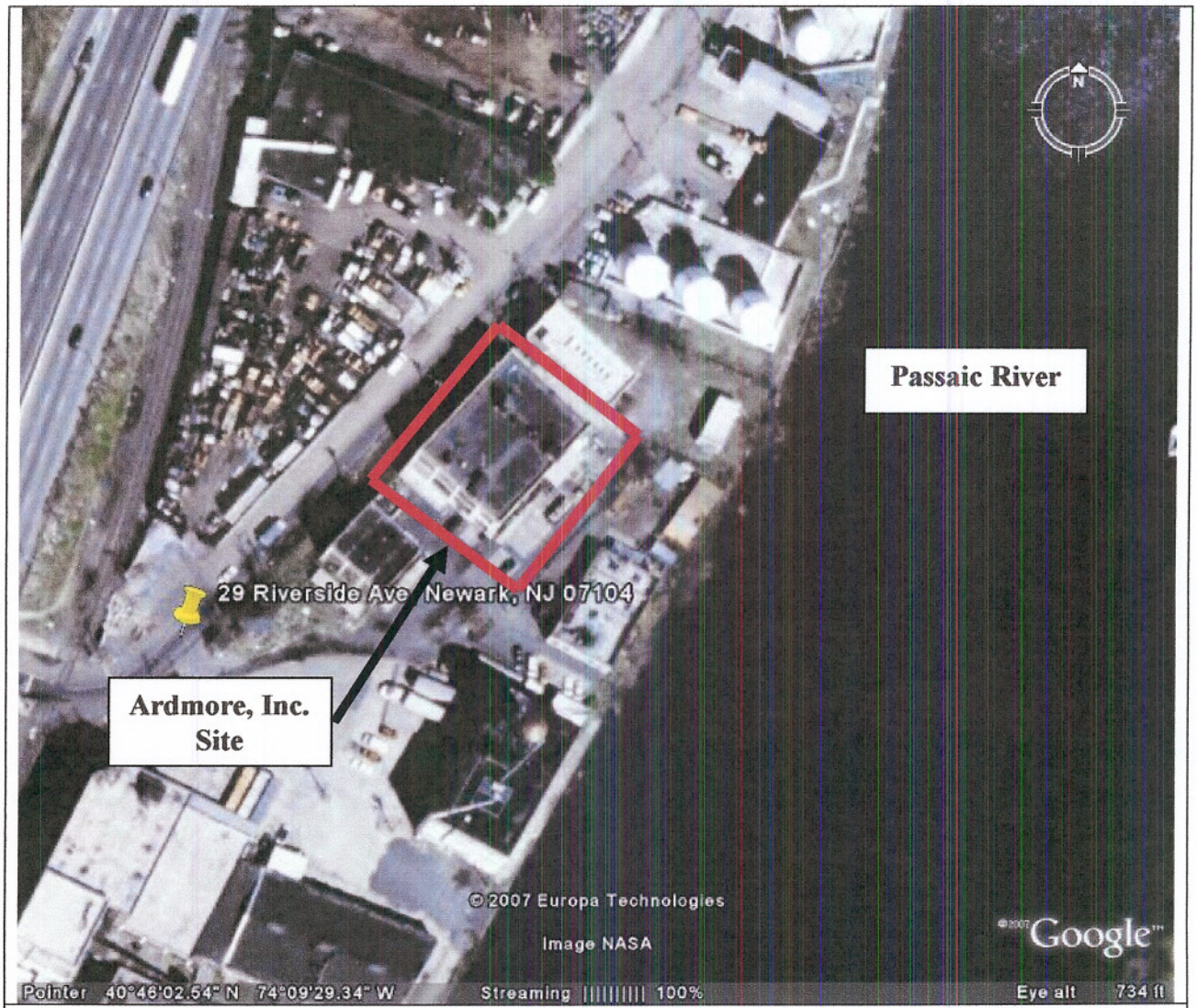
DATES OF OPERATION (include info. on predecessors/successors if known):

Ardmore commenced operations at the Site in 1958. The company filed its most recent annual report with the State of New Jersey on June 14, 2006, and PVSC documentation identifies the company as continuing to operate at the Site as of 2006. (FAU000336 at Tab 1, FAU000343 at Tab 4, FAU000348 at Tab 7)

DESCRIPTION OF FACILITY OPERATIONS (list CERCLA hazardous substances used, manufactured or present):

The Ardmore facility is located in Building 14 at 29 Riverside Avenue, Newark, Essex County, NJ. The Site is bordered by Riverside Avenue to the northwest, by industrial buildings and Riverside Avenue to the southwest, and by industrial buildings to the northeast and southeast. The Passaic River lies to the east of the Site.
(FAU000027 at Tab 8)

The following annotated aerial photograph identifies the approximate location of the Ardmore operation in Newark, NJ:



Ardmore, Inc.
29 Riverside Avenue
Newark, NJ 07104

Aerial Photo Copyright 2007
Photo Source: Google Earth (Europa Technologies/Image NASA)

Site boundary line locations as shown are approximations

(FAU000025 at Tab 14, FAU000055 at Tab 5)

Ardmore manufactures specialty chemicals and esters. The company's products include surfactants and esters that are primarily utilized in the cosmetics, personal care, and detergent industries. (FAU000032 at Tab 5, FAU000415 at Tab10)

Principal raw materials utilized in the Ardmore operations consist of organic acids and alcohols. (FAU000032 at Tab 5)

PERMITS (provide dates):

NPDES:

NJPDES DSW Permit Number NJ0117552 -	Industrial Stormwater Discharge Permit. Discharge to surface water (Passaic River). Permit issued May 18, 2007 with an expiration date of May 31, 2012. The permit is also designated as individual permit NJPDES Permit # NJG0117552 for authorization to discharge under the State of New Jersey General Stormwater Permit NJPDES # NJ0088315. (FAU000376-377 at Tab 3, FAU000382 at Tab 11, FAU000393 at Tab 12, FAU000415 at Tab 10, FAU000429 at Tab 13)

PVSC (pretreatment):

PVSC Sewer Connection Permit Number 20200045 –	PVSC discharge permit. Permit effective from April 18, 2003 through March 31, 2008. (FAU000002 at Tab 14)
PVSC Sewer Connection Permit Number 20405690 –	PVSC discharge permit. Circa 1997. (FAU000035 at Tab 5)

NEXUS TO LOWER PASSAIC RIVER STUDY AREA (describe in detail; cite to supporting documentation; date or time period of disposal; list CERCLA hazardous substances; and volume, if known):

Direct (e.g. pipe, outfall, spill):

No information is available at this time.

Sanitary Sewer (provide name and location of CSO; details regarding CSO overflows and dates:

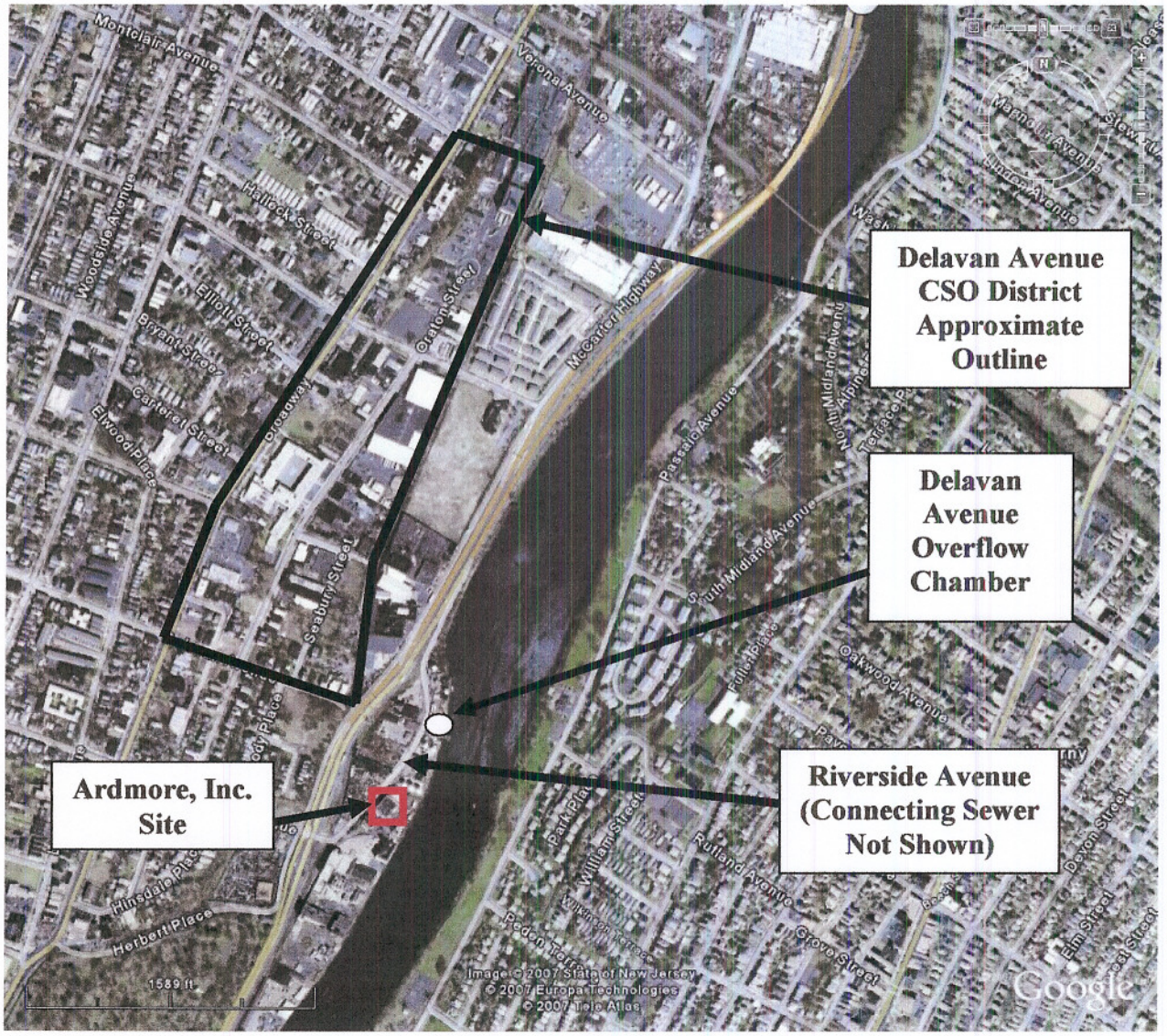
All dischargers into "navigable waters" of the United States were required under the Federal Water Pollution Control Act Amendments of 1972 to apply for a NPDES permit from the USEPA. PVSC received its NPDES Permit, effective February 28, 1975. (KLL004868 at Tab 15, KLL006250 at Tab 16)

As of April 8, 1976, PVSC adopted its "Rules and Regulations of the PVSC Concerning Sewer Connection Permits" and provided them, as of April 12, 1976, to each "user municipality" in the PVSC system for their adoption and use. (KLL005050-51 at Tab 17)

The 1975 NPDES Permit for PVSC included the combined sewer outfall located at Herbert Place in Newark as one of the "permitted" discharge point to the Passaic River. (KLL006268 at Tab 16)

The facility is located in the Delavan Avenue CSO district. Information provided by Ardmore to PVSC indicates that wastewater generated at the facility is discharged to a sewer line located along Riverside Avenue at the front of the property. An historical figure showing the sewer lines in the area of the Ardmore Site was obtained from the City of Newark Department of Engineering. The figure, indicated as being from the City of Newark Department of Public Works, is not dated. The City of Newark figure depicts a 12-inch sewer line in the southern section of Riverside Avenue and adjacent to the approximate location of the Ardmore Site. The sewer line is depicted on the figure as running in a northerly direction toward the foot of Delavan Avenue. All of the sewer lines in that section of Riverside Avenue are ultimately shown as being routed into a 54-inch sewer line at the foot of Delavan Avenue that discharges to the Passaic River. Provided for review as an exhibit to this report is a zoom-in view of the City of Newark Department of Public Works sewer figure which has been annotated to show the approximate location of the Ardmore Chemical Site relative to the Delavan Avenue CSO District outfall. (FAU000055 at Tab 5, KLL017012 at Tab18, KLL017037 at Tab18, FAU000472 at Tab 52, FAU000472A at Tab 52)

The following annotated aerial photograph identifies the approximate location of the Ardmore Chemical Site within the Delavan Avenue CSO district.



Ardmore, Inc. Site and Delavan Avenue CSO District
Newark, NJ

Aerial Photo Copyright 2007
Photo Source: Google Earth (State of New Jersey/Europa Technologies/Tele Atlas)

Site boundary line locations as shown are approximations

(KLL017012 at Tab 18)

The overflow chamber for the Delavan Avenue CSO district is reportedly located in the western side of Riverside Avenue and 300 feet south of the intersection with State of New Jersey Route 21. The Delavan Avenue CSO district is reported to be served by one 10-inch outfall sewer and one 54-inch outfall sewer. The condition of the outfall(s) was described in 1976 by PVSC as "clear". (KLL017007 at Tab 18)

With regard to the Delavan Avenue CSO, the 1976 PVSC Overflow Analysis report states that:

> *"Under normal dry weather flow conditions, the flow is diverted to the PVSC interceptor via the regulator. During periods of rainfall, a portion of the combined flow enters the interceptor, with the balance overflowing the stop logs and being discharged through the outfall line in to the Passaic River."*

(KLL017007 at Tab 18)

Sampling of the Ardmore wastewater discharge to the PVSC system in October 1997 served to identify the following contaminants and general parameters:

- Biochemical oxygen demand
- Copper
- Cyanide
- Lead
- Nickel
- pH
- Total suspended solids
- Zinc

(FAU000035-36 at Tab 5)

The following Notices of Violation ("NOV's) and/or reports of permit exceedences have been issued to Ardmore based upon historical noncompliant exceedences of certain hazardous substances detected in the facility's wastewater discharge to the PVSC system:

- In its "Pretreatment Annual Report Number 6", dated 09/15/1989 and issued by PVSC for the period 08/01/1988 through 07/31/1989, Ardmore was noted with a "compliance status" of not being in compliance by PVSC. As of the date of the annual report, Ardmore was indicated as not meeting applicable federal pretreatment standards, (specifically 40 CFR Ch. 1 §414.85 Subpart H), concerning the discharge of pollutants to a publicly owned works ("POTW") from an "existing source" with process wastewater generated from the manufacture of bulk or commodity organic chemicals. No further details as to the specific non-compliance issues at Ardmore were provided in the PVSC report. (ABC151900 at Tab 49, FAU000446 at Tab 50, FAU000460 at Tab 50)

- A January 1997 NOV was issued by PVSC to Ardmore due to the company's use of elevated wastewater sampling detection limits, which were higher than the PVSC

permitted detection limits. Ardmore utilized the elevated detection limits from January 1994 through August 1996. (FAU000092-94 at Tab19)

- In November 1997, PVSC issued an NOV to Ardmore when it was observed during an October 1997 inspection that the facility LEL monitoring system had recorded "spikes" during September 1997. It was reported that the facility's LEL recording system indicated "non-compliance by spiking over 30% to 42% and then again to 82%" during the period from September 1, 1997 to September 30, 1997. Ardmore indicated that the excursions were due to erroneous instrument readings. (FAU000084 at Tab 20, FAU000087 at Tab 21)

  In general, measurements of the "explosive limit" of a gas or vapor is the limiting concentration (in air) that is needed for the gas to ignite and explode. The lower explosive limit or "LEL" indicates the concentration of a gas in air, below which there is not enough fuel to provide for an explosion. According to the "Rules and Regulations Concerning Discharges to the Passaic Valley Sewerage Commissioners Treatment Works" dated after May 19, 2004, it is indicated that LEL measurements serve to indicate the presence of an aqueous layer/medium that contains water immiscible flammable or explosive materials. (FAU000085A at Tab 47, FAU000085H at Tab 48)

- An August 1998 NOV was issued by PVSC to Ardmore when it was reported that the facility had exceeded permit limits for toluene in its wastewater discharge to the PVSC system for May 1998. (FAU000103 at Tab 22, FAU000111 at Tab 23, FAU000115 at Tab 23)

- A June 2000 NOV was issued by PVSC to Ardmore when it was reported that the facility had exceeded permit limits for bis(2-ethylhexyl)phthalate in the Ardmore facility's wastewater discharge to the PVSC system for January 2000. Ardmore advised PVSC via letter in August 2000 that their Newark facility did not use bis(2-ethylhexyl)phthalate in its processes, and that the contaminant was traced to material used in the tubing and pumps at the facility. (FAU000139 at Tab 24, FAU000263 at Tab 25)

- A monitoring report for samples taken on May 23, 2001 indicated that Ardmore exceeded the threshold value for copper. (FAU000252 at Tab 25)

- In the PVSC Pretreatment Annual Report Number 18 dated 09/14/2001 and for the period 08/01/2000 through 07/31/2001, Ardmore was noted as having paid a fine to PVSC during the period of the annual report. No further details as to the specific violation, dates, and the amount of the fine were provided in the report. (ABC151763 at Tab 51)

- A monitoring report for samples taken on February 28, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000237 at Tab 27)

- A monitoring report for samples taken on March 28, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000229 at Tab 28)

- A monitoring report for samples taken on March 30, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000233 at Tab 29)

- A monitoring report for samples taken on August 30, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000225 at Tab 30)

- A monitoring report for samples taken on September 30, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000221 at Tab 31)

- A monitoring report for samples taken on October 30, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000217 at Tab 2)

- A monitoring report for samples taken on November 27, 2002, indicated that Ardmore exceeded the threshold value for copper. (FAU000201 at Tab 32)

- A monitoring report for samples taken on December 23, 2002 indicated that Ardmore exceeded the threshold value for copper. (FAU000197 at Tab 33)

- In January 2003, Ardmore received an NOV from PVSC based upon November 2002 pH violations recorded below 5.0 pH levels. In March 2003, Ardmore was advised via letter from PVSC that it was sustaining the NOV issued to Ardmore in January 2003. PVSC advised that "after careful review by our inspector and staff, PVSC sees no reason to rescind this violation." (FAU000081 at Tab 34, FAU000260 at Tab 35)

- A monitoring report for samples taken on January 30, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000193 at Tab 36)

- A monitoring report for samples taken on February 28, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000189 at Tab 137)

- A monitoring report for samples taken on March 27, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000248 at Tab 38)

- In April 2003, Ardmore received an NOV from PVSC when it was observed, during a February 2003 inspection, that the discharge from a facility storm water collection sump was located at a point upstream of Ardmore's final sampling point for the facility's wastewater discharge to the PVSC system. This stormwater input was indicated by PVSC as serving to dilute the facility wastewater discharge being monitored by PVSC. It was also observed by PVSC that the facility's sanitary wastestream was tied in after the sampling point and therefore not represented in the facility's monthly discharge sampling events. (FAU000073 at Tab 40)

- A monitoring report for samples taken on April 27th, April 28th, and April 30, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000248 at Tab 38)

- A monitoring report for samples taken on May 20, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000185 at Tab 41)

- A monitoring report for samples taken on September 3, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000177 at Tab 42)

- A monitoring report for samples taken on October 10, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000173 at Tab 43)

- A monitoring report for samples taken on November 20, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000213 at Tab 44)

- A monitoring report for samples taken on December 9, 2003 indicated that Ardmore exceeded the threshold value for copper. (FAU000205 at Tab 45)

- A monitoring report for samples taken on January 15, 2004 indicated that Ardmore exceeded the threshold value for copper. (FAU000209 at Tab 46)

Storm Sewer:

As discussed above, PVSC documented that the facility storm water collection sump was routed to the combined sewer and the PVSC system. (FAU000073 at Tab 40)

In January 2007, Ardmore received an NOV from the State of New Jersey Department of Environmental Protection ("NJDEP") for the facility's failure to properly retain records and for failing to properly report the findings from annual inspections, as required under its stormwater discharge permit. (FAU000389 at Tab 9)

Runoff:

No information is available at this time.

Groundwater:

No information is available at this time.

POTENTIAL NEXUS TO LOWER PASSAIC RIVER STUDY AREA (describe in detail; cite to supporting documentation; list CERCLA hazardous substances; and volume, if known):

Direct (e.g. pipe, outfall, spill):

Sanitary Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

See information provided above concerning documented discharges of hazardous substances from this facility to the CSO.

Storm Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

No information is available at this time.

Runoff:

No information is available at this time.

Groundwater:

No information is available at this time.